

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STEVEN CABRAL,

Plaintiff,

V.

C.A. No. 04-CV-11961 MEL

**STONE CONTAINER
CORPORATION,**

Defendant.

JOINT MOTION TO AMEND PRE-TRIAL SCHEDULE

The parties to the above-referenced matter, Steven Cabral and Stone Container Corporation, move that the Court amend the pre-trial schedule that has been set in this case and move all dates forward by ninety (90) days. As grounds for this Joint Motion, the parties state the following:

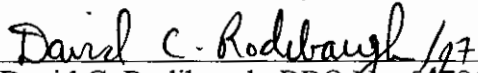
1. On June 23, 2005 the Plaintiff presented the Defendant with a settlement demand.
2. The parties have agreed to mediate the case with a private mediator and they are in the process of selecting said mediator.
3. Under the current pre-trial schedule, trial experts and their reports are to be disclosed by July 18, 2005.
4. The parties seek to mediate the case before incurring the time and expense associated with expert discovery.
5. A ninety (90) day continuance of all deadlines in the pre-trial schedule will enable the parties to focus their efforts on mediation and possible settlement of this matter.

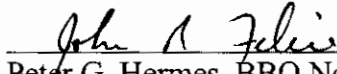
WHEREFORE, the parties respectfully request that this Court amend the pre-trial schedule that has been set in this case and move all dates forward by ninety (90) days, such that the new pre-trial schedule is as follows:

1. Trial experts and their respective reports disclosed by October 18, 2005.
2. Expert depositions completed by December 16, 2005.
3. Dispositive Motions filed by February 17, 2006.
4. Final Pre-Trial Conference on March 17, 2006.

The Plaintiff,
STEVEN CABRAL,
By his attorneys,

The Defendant,
STONE CONTAINER CORPORATION,
By its attorneys,


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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by first class mail, postage prepaid, on the following counsel of record:

David C. Rodibaugh, Esq.
Ananian & Rodibaugh
116 Beech Street
Belmont, MA 02478

Date: 7/6/05


John R. Felice

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